

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RONARD LORA, HUGO RIVERA, MARCO
ANTONIO DIAZ, MELVIN LORA, EDUARDO
LORA, GIOVANNI PAULINO, JOSE RODRIGUEZ,
and JOSE RODOLFO RODRIGUEZ-TINEO,
individually and on behalf of all others similarly
situated,

Plaintiffs,

- against -

J.V. CAR WASH, LTD., BROADWAY HAND
CARWASH CORP., WEBSTER HAND
CAR WASH CORP., HARLEM HAND
CAR WASH INC., BAYWAY HAND
CAR WASH CORP., JOSE VAZQUEZ,
SATURNINO VARGAS, JOSE JIMENEZ,
RAMON PEREZ, DOMINGO "DOE,"
ADOLFO FEDERUS, originally sued as ADOLFO "DOE,"
and JOHN DOES 1-10,

Defendants.
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Index No. 11-CV-9010 (LLS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying (1) Declaration of Steven Arenson, Esq., dated March 30, 2015; (2) Declaration of Laura E. Longobardi, Esq., dated March 30, 2015, and the exhibits attached thereto; (3) Declaration of Samuel Estreicher, Esq., dated March 30, 2015, and the exhibits attached thereto; (4) Declaration of Barry Goldstein, Esq., dated March 24, 2015, and the exhibits attached thereto; (5) Declaration of Lloyd R. Ambinder, Esq., dated February 25, 2015; (6) Declaration of Debra L. Raskin, Esq., dated February 23, 2015; (7) Declaration of Stephen M. Orlofsky, Esq., dated February 23, 2015; (8) the Memorandum of Law, dated March 30, 2015, and the prior pleadings in this action, Named Plaintiffs Ronard Lora, Hugo Rivera, Marco Antonio Diaz, Melvin Lora, Eduardo Lora, Giovanni Paulino, Jose Rodriguez and Jose Rodolfo Rodriguez-Tineo, and Opt-In Plaintiffs Ramon Alvarez, Denis Rene Barahona, Margarito Gallardo, Braulio Flores Matamoras, Robertico Perez Olmos, Jose Antonio Pichardo, Michel Rodriguez, Francisco Guerrero, Rojas Corona Valerio and Ramiro Rodriguez del Pilar (collectively, the "Plaintiffs"), by and through their attorneys, Arenson, Dittmar & Karban, shall move this Court at the United States District

Court, 500 Pearl Street, New York, New York 10007, on a date and time to be set by the Court, for an Order (a) granting Plaintiffs an award of statutory attorneys' fees and expenses pursuant to Section 216(b) of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 216(b), and Section 198(1-a) of the New York Labor Law, N.Y. LAB. L. § 198(1-a); and (b) granting Plaintiffs such other and further relief as the Court may deem just and proper.

Dated: New York, New York
March 30, 2015



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